

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 13-10200-GAO
)
 DZHOKHAR TSARNAEV)

DECLARATION OF BROOKE GOTTLIEB

I, Brooke Gottlieb, depose and state as follows:

1. I am a paralegal employed by the Federal Public Defender Office in Boston. I submit this declaration in connection with the defense Reply to the Government's Opposition to Defendant's Motion for Judgment Notwithstanding Verdict and for New Trial.

2. I was asked to identify, to the extent possible, the geographic location of the trial jurors' Facebook "friends" and to summarize my findings in a chart, broken down in the following categories: Greater Boston (using the U.S. Census Bureau designation Boston-Cambridge-Nashua, MA-NH Metropolitan "NECTA"— New England City and Town Area), New England (MA and NH other than Greater Boston, VT, RI, CT, ME), Other, and Unknown.

3. For each juror “friend,” I first looked to see whether the individual self-identified his or her location on his or her Facebook page. If the “friend” did so, I recorded that information.

4. For juror “friends” who did not self-identify a location, I used the name, in conjunction with other information the individual revealed publicly in his or her Facebook profile, to attempt to identify the individual’s location with the assistance of other publicly accessible databases.

5. The chart summarizing my findings is attached hereto.

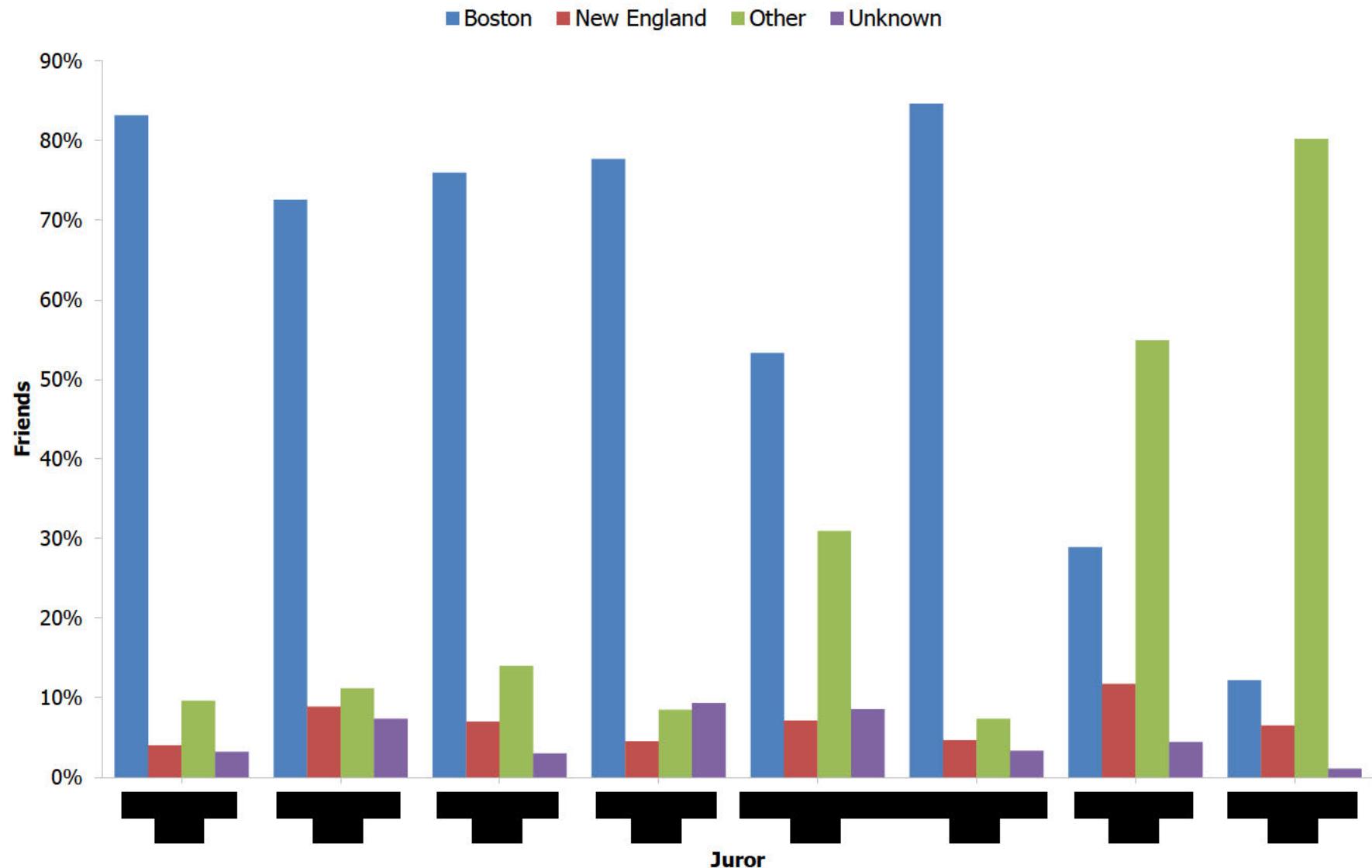
Submitted under the pains and penalties of perjury.

/s/ Brooke Gottlieb

Brooke Gottlieb

October 30, 2015

Locations of Jurors' Facebook Friends



Count of Friend	Location				
	Juror	Boston	New England	Other	Unknown
[REDACTED]		83%	4%	10%	3%
[REDACTED]		73%	9%	11%	7%
[REDACTED]		76%	7%	14%	3%
[REDACTED]		78%	5%	8%	9%
[REDACTED]		53%	7%	31%	9%
[REDACTED]		85%	5%	7%	3%
[REDACTED]		29%	12%	55%	4%
[REDACTED]		12%	7%	80%	1%

Count of Friend	Location				
	Juror	Boston	New England	Other	Unknown
[REDACTED]		519	25	60	20
[REDACTED]		286	35	44	29
[REDACTED]		76	7	14	3
[REDACTED]		742	43	81	89
[REDACTED]		112	15	65	18
[REDACTED]		127	7	11	5
[REDACTED]		308	125	585	47
[REDACTED]		45	24	296	4